

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS (CHICAGO)**

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DARRICK LASHAWN WILLIAMS,

CASE NO: 1:24-cv-01893

Plaintiff,

Judge Honorable Mary M. Rowland

vs.

TRANS UNION LLC.

Defendant.

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**DEFENDANT TRANS UNION, LLC’S  
MOTION TO DISMISS PLAINTIFF’S COMPLAINT**

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Defendant consumer reporting agency (“CRA”), Trans Union, LLC (“Trans Union”), hereby submits its Motion to Dismiss Plaintiff’s Complaint (the “Motion”).

The Motion should be granted in this alleged Fair Credit Reporting Act (“FCRA”) case where *pro se* Plaintiff vaguely claims that Trans Union violated the FCRA by reporting his four “negative accounts,” including Austin Capital Bank, Discover Bank, Self Financial, Inc./Lead Bank, and Sunrise Bank Self Lender (the “Accounts”), which Plaintiff claims are “inaccurate or incomplete,” because:

- A. A showing of an inaccuracy is an essential *prima facie* element of a claim under the FCRA, and Plaintiff has failed to allege what information Trans Union reported much less how it was inaccurate;
- B. Pursuant to the FCRA, case law holds that Trans Union is not required to obtain Plaintiff’s consent or permission to report the Accounts;

- C. Case Law Holds That Trans Union is Not Required To Obtain And Provide Plaintiff With “Proof” or “Written Validation” When Performing A Reasonable Reinvestigation To Verify The Accuracy Of The Information It Reports.
- D. Plaintiff has failed to allege, as required, any plausible injury stemming from the alleged “Inaccurate or Incomplete” Accounts; and
- E. Plaintiff’s claims should be dismissed with prejudice because amendment would be futile since the facts would not change and there is no way that Plaintiff could manipulate the facts to state a claim under the FCRA.

WHEREFORE, Trans Union respectfully requests that the Court grant Trans Union’s Motion, Dismiss Plaintiff’s Complaint against Trans Union in its entirety, and with prejudice, and award Trans Union its fees and costs incurred in defending this action, including reasonable attorneys’ fees, along with such other relief as the court deems equitable and just.

Respectfully submitted,

s/ Sydney O. Burden  
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*Counsel for Defendant Trans Union, LLC*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been electronically filed on the **6<sup>th</sup> day of May, 2024**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **6<sup>th</sup> day of May, 2024**, properly addressed as follows:

<b>PRO SE PLAINTIFF:</b> Darrick Lashawn Williams P.O. Box 408994 Chicago, IL 60640 Email: <a href="mailto:Williams.darrick@gmail.com">Williams.darrick@gmail.com</a>	
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